

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF OKLAHOMA**

1. MARK SCHOGGINS, PERSONAL
REPRESENTATIVE of the ESTATE
of MARK ANSON SCHOGGINS,
Deceased,
Plaintiff,

vs.

Case No. 21-cv-133-JFH

1. STATE OF OKLAHOMA, EX REL.
OKLAHOMA HIGHWAY PATROL,
2. CITY OF McALESTER,
OKLAHOMA, a municipality,
3. GARRET GRAY, individually,
4. JAMES McKEE, individually,

Defendants.

DEFENDANT CITY OF McALESTER'S PRELIMINARY EXHIBIT LIST

COMES NOW the Defendant, City of McAlester, by and through their attorneys of
record, STEIDLEY & Neal, P.L.L.C., and submits the following Exhibit List:

No.	Exhibit	Location
1	Call Sheet Report	100 East Carl Albert Parkway McAlester, Oklahoma 74501
2	Audio Recordings of 911 calls	100 East Carl Albert Parkway McAlester, Oklahoma 74501
3	Audio Recordings of radio communication between McAlester Police and Dispatch.	100 East Carl Albert Parkway McAlester, Oklahoma 74501
4	Surveillance footage from Alamo Liquor	100 East Carl Albert Parkway McAlester, Oklahoma 74501
5	Bodycam footage of McAlester Police Officers	100 East Carl Albert Parkway McAlester, Oklahoma 74501
6	Dashcam and car interior camera footage from Oklahoma Highway Patrol vehicles	100 East Carl Albert Parkway McAlester, Oklahoma 74501
7	Photographs of the scene	100 East Carl Albert Parkway McAlester, Oklahoma 74501

8	Oklahoma Department of Public Safety, Oklahoma Highway Patrol Investigation.	100 East Carl Albert Parkway McAlester, Oklahoma 74501
9	Email from Jerry Pool to James Beaty	100 East Carl Albert Parkway McAlester, Oklahoma 74501
10	Road maps and/or satellite images of the City of McAlester	100 East Carl Albert Parkway McAlester, Oklahoma 74501
11	McAlester Police Department Pursuit Policy	100 East Carl Albert Parkway McAlester, Oklahoma 74501
12	McAlester Police Department Use of Force Policy	100 East Carl Albert Parkway McAlester, Oklahoma 74501
13	Resume and Credential sheet for Paul Taylor, expert witness.	100 East Carl Albert Parkway McAlester, Oklahoma 74501
14	Report of Paul L. Taylor "Re: Mark Anson Schoggins"	100 East Carl Albert Parkway McAlester, Oklahoma 74501
15	Plaintiff's Responses to Defendant City of McAlester's Discovery Requests	
16	Defendant City of McAlester's Responses to Plaintiff's Discovery Requests	
17	Defendant OHP's Responses to Plaintiff's Discovery Requests	
	All Exhibits listed by Plaintiff not objected to by this Defendant.	
	All Exhibits listed by Co-Defendants not objected to by this Defendant.	
	Discovery is ongoing. This Defendant reserves the right to amend this Exhibit List	

Respectfully submitted,

STEIDLEY & NEAL, PLLC
Attorneys for Defendant, City of
McAlester

By: s/Sean M. McKelvey
Sean M. McKelvey, OBA #17098
mmm@steidley-neal.com
Meaghen E. Clark, OBA #32830
mac@steidley-neal.com
Clark W. Crapster, OBA #22112
cwc@steidley-neal.com
P.O. Box 1165

McAlester, OK 74502
(918)423-4611
(918)423-4620 - fax

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of August, 2022, I electronically transmitted the above and foregoing document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

Gary J. James, OBA #12718
gary@garyjameslaw.com
Attorney for Defendants Gray & McKee, individually

Kevin McClure, OBA #12767
kevin.mcclure@oag.ok.gov
Attorney for Defendants Gray, McKee & OHP

Warren Gotcher
Gotcher & Beaver
323 E. Carl Albert Parkway
P.O. Box 160
McAlester, OK 74502
Attorney for Plaintiff

/s/ Sean M. McKelvey